



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 25, 2019

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshal United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Jamie Frierson, 19 Cr. 450 (PGG)*

Dear Judge Gardephe:

The Government respectfully writes, with the consent of defense counsel, to request that the Court schedule an arraignment and initial conference before the Court in the above-captioned matter. The Government understands that the Court is unavailable for a conference before July 10, 2019, and that the Court referred the matter to Magistrate Court for an arraignment. The defendant, however, is undergoing medical care and defense counsel has requested that the arraignment occur at the initial conference before the Court, to minimize the number of times the defendant must travel from the medical center to the courthouse. Therefore, the parties request that the Court set a date for the arraignment and initial conference at a time that is convenient to the Court.

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Should the Court grant this request, the Government requests that the time until the arraignment be excluded in the interests of justice, under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), since this schedule will minimize disruption to the defendant's medical care. Moreover, the Government has produced discovery in this matter, and an exclusion will give the defendant time to review discovery with his counsel and consider any potential motions or a potential resolution of the case.¹

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
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cc: Christopher Flood, Esq. (by ECF)

¹ The Government did not specifically address the exclusion of time with defense counsel when discussing the arraignment, and defense counsel is currently out of the office so the Government has been unable to confer on this issue.